

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS AND WILLIAM  
ZHANG, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and  
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-2809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND  
LLC and JOHNNY HONG, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,  
DANIEL LARIMER, IAN GRIGG, and  
BROCK PIERCE,

Defendants.

Civ. No.: 1:20-cv-3829-LAK

CLASS ACTION

**LEAD PLAINTIFF'S NOTICE OF MOTION FOR AWARD OF ATTORNEYS' FEES  
AND EXPENSES AND AWARDS TO LEAD PLAINTIFF PURSUANT TO  
U.S.C. §78(u)-(4)(A)(4)**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying Memorandum in Support of  
Award of Attorneys' Fees and Expenses and Awards to Lead Plaintiff Pursuant to 15 U.S.C.  
§78U-4(A)(4); the Declaration of Daniel L. Berger in Support of Motion for an Award of  
Attorneys' Fees and Expenses; Declaration of James Koutoulas Law LLC in Support of Motion

for Award of Attorneys' Fees and Expenses; Declaration of Ievgeniia P. Vatrenko, Esq. in Support of Motion for Award of Attorneys' Fees and Expenses; and Declaration of Samuel Tenenbaum of the Bluhm Legal Clinic of the Northwestern Pritzker School of Law in Support of Motion for Award of Attorneys' Fees and Expense; and Declaration of Brandon Elsasser on Behalf of Lead Plaintiff Crypto Assets Opportunity Fund, LLC; and all prior pleadings and proceedings had herein, Lead Plaintiff Crypto Assets Opportunity Fund LLC, by and through its attorneys, will move the Court, at a hearing to be held on September 19, 2023 at 2:00 p.m. before the Honorable Lewis A. Kaplan, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for entry of an order providing for (1) an Award of Attorneys' Fees to Lead Counsel in the amount of 25% of the Settlement Fund; (2) Reimbursement of Expenses incurred by Counsel in the prosecution of this action in the amount of \$81,599.31; and (3) an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78U-4(A)(4) in the amount of \$31,000.

DATED: New York, NY  
July 25, 2023

Respectfully submitted,  
/s/ *Daniel L. Berger*  
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Opportunity Fund LLC*